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A2 GLOBAL RISK LIMITED  
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Attorneys for Plaintiff  
APPLE INC.

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

APPLE INC.,

Plaintiff,

v.

ALLAN & ASSOCIATES LIMITED, A2  
GLOBAL RISK LIMITED, BRADLEY  
JAMES ALLAN, and DOES 1-100,  
inclusive,

Defendants.

Case No. 5:19-cv-08372-NC

**STIPULATION TO EXTEND  
RESPONSIVE PLEADING FILING  
DEADLINE; AND PROPOSED ORDER  
THEREON**

[Removed from Santa Clara County  
Superior Court Case No. 19CV358715]

1 Plaintiff Apple Inc., a California corporation ("Plaintiff"), Defendant Allan &  
 2 Associates Limited, a Hong Kong private limited company ("Defendant"), and Specially-  
 3 Appearing Defendants A2 Global Risk Limited, a British private limited company, and  
 4 Bradley James Allan, an individual (collectively with Defendant, "Defendants"), by and  
 5 through their respective counsel of record, hereby stipulate as follows:

6 WHEREAS, on November 15, 2019, Plaintiff commenced an action against  
 7 Defendants in the California Superior Court for Santa Clara County entitled, *Apple, Inc. v.*  
 8 *Allan & Associates Limited, et al.*, Case No. 19CV358715.

9 WHEREAS, on December 23, 2019, Defendant filed a Notice of Removal of the  
 10 state court action to the United States District Court for the Northern District of California,  
 11 San Jose Division, pursuant to 28 U.S.C. Sections 1332, 1441 and 1446.

12 WHEREAS, Defendants intend to file a motion or motions to dismiss the  
 13 Complaint, but their deadline to do so is December 31, 2019.

14 WHEREAS, in light of the holidays and pre-existing travel plans over the same  
 15 period, Defendants will require additional time to confer with Plaintiff about the nature and  
 16 substance of their proposed motion and to prepare and file their motion(s).

17 WHEREAS, the parties agree to the following briefing schedule:

18 1. Defendants' deadline to respond to the Complaint shall be January  
 19 17, 2020;

20 2. Apple's deadline to file its opposition to Defendants' motion(s) to  
 21 dismiss shall be February 18, 2020; and

22 3. Defendants' deadline to file their reply brief(s) in support of their  
 23 motion(s) to dismiss shall be February 25, 2020.

24 WHEREAS, the parties agree that the filing of this Stipulation shall not waive the  
 25 right of any of the Defendants to challenge the jurisdiction of this Court.

26 WHEREAS, this is the first request to extend the deadline to file a responsive  
 27 pleading.

1 WHEREAS, the requested extension will not alter any deadlines set by the Court  
2 in its Order Setting Initial Case Management Conference and ADR Deadlines (ECF No.  
3 4).

4 IT IS SO STIPULATED.

5 DATED: December 27, 2019

HANSON BRIDGETT LLP

6 By: /s/ Michael F. Donner

7 Michael F. Donner  
8 Anthony J. Dutra  
9 Attorneys for Defendant  
10 ALLAN & ASSOCIATES LIMITED  
11 and Specially-Appearing Defendants  
12 A2 GLOBAL RISK LIMITED and BRADLEY  
13 JAMES ALLAN

11 DATED: December 27, 2019

LATHAM & WATKINS LLP

12 By: /s/ Melanie M. Blunschi

13 Melanie M. Blunschi  
14 Elizabeth C. Gettinger  
15 Attorneys for Plaintiff  
16 APPLE INC.

16 **FILER'S ATTESTATION**

17 Pursuant to N.D. Cal. L.R. 5-1(i)(3), I, Michael F. Donner, hereby attest that I have  
18 obtained the concurrence in the filing of this document from each of the other signatories.

19 DATED: December 27, 2019

/s/ Michael F. Donner

20 MICHAEL F. DONNER

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**ORDER**

Based on the foregoing Stipulation, and good cause appearing therefore,

It is hereby ordered that:

1. Defendants' deadline to respond to the Complaint shall be January 17, 2020;

2. Apple's deadline to file its opposition to Defendants' motion(s) to dismiss shall be February 18, 2020; and

3. Defendants' deadline to file their reply brief(s) in support of their motion(s) to dismiss shall be February 25, 2020.

The filing of the above Stipulation shall not waive the right of any of the Defendants to challenge the jurisdiction of this Court.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. NATHANAEL COUSINS  
UNITED STATES MAGISTRATE JUDGE